IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE, NASHVILLE DIVISION

JOHN DOE (JLB),

Plaintiff,

vs.

DAVID B. RAUSCH, Director of the Tennessee Bureau of Investigation, in his official capacity, and *JEFF LONG*, Commissioner of the Department of Safety and Homeland Security, in his official capacity,

Motion GRANTED.

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Case No. 3:25-cv-0766

Defendants.

PLAINTIFF'S MOTION TO PROCEED UNDER PSEUDONYM AND FOR PROTECTIVE ORDER

Plaintiff hereby moves the Court for permission to proceed in this action under the pseudonym "John Doe (JLB)" and to enter a protective order barring the disclosure of Plaintiffs' true name or other information that identifies Plaintiff or Plaintiff's family members, directly or indirectly, and requiring that any documents containing such information be redacted or filed under seal.

In support of this motion, Plaintiff rely upon Plaintiff's supporting memorandum and the entire record in this case and states:

- 1. Courts "may excuse plaintiffs from identifying themselves in certain circumstances" where "a plaintiff's privacy interests substantially outweigh the presumption of open judicial proceedings." *Doe v. Porter*, 370 F.3d 558, 560 (6th Cir. 2004).
- 2. Fed. R. Civ. Proc. 26(c) authorizes the Court to "make any order which justice requires to protect the party or person from annoyance, embarrassment, oppression, or undue burden or expense" upon motion of a party.